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February 9, 2024

VIA ECF

Honorable Rachel P. Kovner
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *L.B. v. City of New York et al*, 1:23-CV-08501 (RPK) (JRC)

Your Honor:

I am the Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York assigned to represent Defendants City of New York and Jess Dannhauser in his official capacity as Commissioner of the New York City Administration of Children's Services ("ACS") (collectively, the "City Defendants") in the above-referenced matter. The Complaint alleges that from January 2021 until August 2023, based on false reports of child neglect and abuse, ACS unlawfully conducted several investigations of Plaintiff L.B.¹ I write to respectfully request that the Court grant the individual defendants a fourth, seven-day, extension of time to respond to Plaintiffs' pending motion to proceed anonymously (the "Motion") *sua sponte*.² Plaintiffs consent to the request.

¹ In addition to the City Defendants, the Complaint names as individual defendants Ariel Semper; Nadine Cenord; Bernadet Jean-Louis; Donna McFadden; Ana Costa; Taiesha Coleman; and Leydi Taveras. Nadine Cenord and Taiesha Coleman departed ACS prior to the filing of the Complaint.

² Defendants were originally directed to respond to the Motion by December 19, 2023. The City Defendants consented to the Motion on December 28, 2023. *See* ECF No. 24.

I have completed representation interviews with five of the six individual defendants. I will complete the final interview with one of the former ACS employees named in Plaintiffs' Complaint today. Barring an unanticipated conflicts issue arising during the final representation interview, I expect to have formalized the engagements with all the individual defendants by early next week.

In addition, one of the individual defendants has had limited ability to engage with the case in recent weeks following the passing of her mother in late January. I would appreciate the additional week to discuss her position with respect to Plaintiffs' Motion further.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Daniel R. Perez

Daniel R. Perez
Assistant Corporation Counsel